

ATTACHMENT 1

COMPLAINT FORM

(for non-prisoner filers without lawyers)

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PETER O'NEILL
CLERK US DISTRICT COURT
WD OF WISCONSIN

IN THE UNITED STATES DISTRICT COURT
FOR THE _____ DISTRICT OF _____

(Full name of plaintiff(s))

Mattie Yackum

58 Northridge Terr. #301

Madison WI 53704

vs

Case Number:

(Full name of defendant(s))

Madison United Healthcare linen

1310 W. Badgerrd

Madison WI 53713

22 CV - 53 BBC
(to be supplied by clerk of court)

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at
(State)

58 Northridge Terr #301
(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Madison United Healthcare linen
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

and (if a person) resides at _____
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Madison United Healthcare linen 1310 W badger rd Madison WI 53713
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

1) Madison United Healthcare linen,

2) Monu Paimor: Asian-lead worker who called me a black lazy nigger lady
8/28/2019 this happen in tumbleford

3) Jennifer Heidible: white-an HR manager who I handed my letter
of Complaint to and she claim she didn't receive it; 8/29/2019

4) TJ Kelly: black-second shift supervisor who terminated my employment
9/12/2019

5) Parwati Dargjee: an Asian, she hit me with an over size linen cart
8/23/2019

All of this happen at Madison United Healthcare linen, because it was a hostile
work environment.

I don't know why this happen to me. I came to work every day
and did everything I was told to do, just to be treated different from
other employees.

- 4) Jennifer Heidible an HR management for Madison United Healthcare linen. I was told that she was the person that I can submit my complaint to. I spoke with Jennifer briefly about Monu's behavior toward me and how she call me a black lazy nigger lady and handed her a copy on 8/28/2019, but again nothing was done. To me, Jennifer never planned on taken action or investigating my complaint. She knew that I was going to be fired. Madison United Healthcare linen dependent on the at will policy that they back bone for this company that they can get away with using, so I figure out how this company had build up the hostile work environment. They don't follow any guidelines of the handbook or employment law.
- 5) Parwati Darjee: Second shift employee for Madison United Healthcare linen also a very good friend of Monu. On 8/23/2019 I was on the 150 gowns folding machine. First I wanna point out the law and regulation for occupational safety standard for workplace and it tools or hazards. I didn't see any of the post displayed like by the lockers, breakroom; no where in the building. So when Parwati decided to try and push this big oversize linen cart by herself with no steering control and the oversize cart was empty she came flying toward me and hit me with the cart on my right thigh. Mr. Kelly was present at the time of the incident and he right away said that it was an accident, this was the only thing he witness to. So I ask Mr. Kelly for a incident report but I never got the form cause on 9/12/2019 at 9:25pm he call me to the office and announce to me that he was letting me go. I ask him why he stated because I don't get along with my co-workers. Well there you have it. All I wanted to say is Madison United Healthcare linen need to be held accountable for the actions and the violation of my right that I fighting for. ~~Why do I think~~ why they did it. From what I analyze is there was no supervision, and it became a habit for those who the company gave favor to and or a long term employee, that this company trust to run the production. So of course the employee who in charge and try to run the production their way this will cause them to have no leadership or anything else. So the manager, supervisor CEOs they all's going believe the who ever they let be in charge will do great job. A new hire have no chance because the company won't believe a word you say so why they did it because I'm black my race is Black.

- 1) Madison United Healthcare linen refused to follow any of the guild line from their very own handbook. I was treated different from other employees, they differentiation was very noticeable. Madison United Healthcare Linen was unwilling to put up with me complaining and try to sweep it under the rug and retaliated on me by terminating my employment with them. I realized that I was work in a hostile environment because I notice the intolerance due to the favoritism that was revealed through their action.
- 2) Mr. Kelly was the second shift supervisor in production, he assigned me to work in the Flatworks department on 7/15/2019 and 7/16/2019 those two days I received training by the lead worker assistant. on 7/17/2019 I was abruptly move by Mr. Kelly to the tumble fold department with no training. Mr. Kelly was never around to witness any harassment and mistreatment that I was going through, but knew about it. because I was telling him on a daily base and I notice how Mr. Kelly develop this irregular behavior toward me and it gotten worse each day I punch in, Mr. Kelly showed favoritism with his lead workers my chance of getting something done about my harassment was unfair and impartiality, but he would tell me to pick up the pace.
- 3) Monu Raimger is a lead worker on second shift for Madison United Healthcare linen on 7/17/2019 as I was working on a machine that folds 150 gowns this lady was targeting me as she fastly approaching me and came face to face and begin yelling loud so other can hear as she snatched the yellow gown out of my hand harassing and embarrass me in front of everyone demanding me to go fast then she walk away laughing with her group of co-workers that was very unwelcome and mistreated that was a violent act of her behavior, on 8/27/2019 I was working on the folding machine for towels and it kept jamming so I ask her if she can call the repair person and she replied go to another machine I did but that machine was doing the same so I ask her again and she stated go to the 150 gown while I call cause you 15 just being a black lazy nigger lady. I was done, at that point I submitted a letter in writing and took my letter to H.R. I really wanted to keep my job but I did deserve the treatment that I was receiving. Monu and her friends looked forward of the harassment on a daily and every time I mention to Mr. Kelly about their behavior he would say I'll take care of it but never was around to observe any of Monu Raimger action, she would try to single me out and she refused to call me by my name my name to her was hey you. and then she made up story to cover up malicious behavior.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ _____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I want the Court order to Place a order that I be made whole in every way! I want the company to be investigated and go through retraining. I also believe that they should be held financially accountable and required that I be made whole

E. JURY DEMAND

☒ Jury Demand - I want a jury to hear my case
OR

☒ Court Trial - I want a judge to hear my case

Dated this Tuesday day of 1/18 2022.

Respectfully Submitted,

Mattie Joakim
Signature of Plaintiff

608-515-9106
Plaintiff's Telephone Number

MattieJoakim700@gmail.com
Plaintiff's Email Address

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE

☒ I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

☐ I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.